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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

RACHEL HANEY SMALLWOOD,
CHANDRA LOVELAND, LAURA
WICKIZER, Individually and On Behalf of a
Class of Others Similarly Situated,

Plaintiffs,

v.

DR. CATHERINE E. CRIM, Personally, DR.
S. SHELTON, Personally, D. BROWN,
Personally,

Defendants.

Case No. 3:18-cv-01816-AC

DECLARATION OF CATHERINE CRIM,
M.D.

I, Catherine Crim, M.D., declare:

1. I am a named defendant in the above-captioned proceeding.

2. I make this declaration in support of Defendants' Response to Plaintiffs' Motion to Compel and under penalty of perjury. I have personal knowledge of and am competent to testify to the facts herein.

3. I received my Medical Degree from the University of California ("U. C.") at Davis in Davis, California in 1986. I completed an internship in Obstetrics and Gynecology in 1987 at the U. C. Davis Medical Center in Sacramento, California. I completed a residency in Obstetrics and Gynecology in 1988 and a residency in Pathology in 1990, both also at the U. C. Davis Medical Center in Sacramento, California. In 1992, I completed an additional residency in Obstetrics and Gynecology at the Kaiser Permanente Medical Center in Santa Clara, California.

4. My Oregon medical license was initially issued in 1993 and expires on December 31, 2021. However, I am currently retired and no longer practicing. Before retirement, my specialty was Obstetrics and Gynecology.

5. I was employed as an obstetrician and gynecologist with Women's Healthcare Associates, LLC from approximately October of 1994 through January of 2020, when I retired from practice. In addition, I also previously served as an obstetrician and gynecologist for the Oregon Department of Corrections ("ODOC").

6. I do not have any former patients' medical records in my possession, custody, or control. I have never taken patients' paper medical records home with me. I do not have access to any electronic medical records of any former patients.

7. I have never checked my information on the website Healthgrades.com. I am not aware of what information is contained on that site about me.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 17, 2021.

s/ Catherine Crim, M.D.
CATHERINE CRIM, M.D.